PB88-172978

Superfund Record of Decision (EPA Region 2) Cooper Road Dump, Camden County, New Jersey (First Remedial Action), September 1987

(U.S.) Environmental Protection Agency
Washington, DC

30 Sep 87

U.S. Department of Commerce
National Technical Information Service
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16. ABSTRACT

The Cooper Road site consists of a 100-square foot dumping area located in Voorhees Township, Camden County, New Jersey. In 1982 several dozen, one-to-two ounce, glass vials containing unknown liquids were discovered at the site. Some vials were broken, but most remained intact. Sampling of the vials by the New Jersey Department of Environmental Protection (NJDEP) indicated the presence of benzene, ethylbenzene, xylene, naphthalene and other contaminants. NJDEP requested the owners of the property perform a complete and total removal of all vials. No response from the site owners followed. The site changed ownership in June 1983, and upon request by NJDEP, the new owners removed all vials and six inches of underlying soil. Subsequent sampling of soil and ground water indicate no contaminants present above normal background levels.

EPA determined that no significant risk or threat to public health and the environment exists and therefore no further action will be taken at this site. There are no implementation issues or costs associated with this no action remedy.

17. KEY WORDS AND DOCUMENT ANALYSIS

a. DESCRIPTORS	b. IDENTIFIERS/OPEN ENDED TERMS	c. COSATI Field/Group
Record of Decision Cooper Road, NJ First Remedial Action - Final Contaminated Media: none Key contaminants: none		

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DECLARATION STATEMENT

RECORD OF DECISION

Cooper Road Dump

SITE NAME AND LOCATION

Cooper Road Dump, Voorhees Township, Camden County, New Jersey

STATEMENT OF PURPOSE

This decision document presents the selected remedial action for the Cooper Road Dump site, developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, November 20, 1985.

STATEMENT OF BASIS

I am basing my decision on the following documents, which are contained in the administrative record and characterize the area and evaluate the relative merits of remedial alternatives for the Cooper Road site:

- Proposed Remedial Action Plan with Attachments, Cooper Road Dump site, August 198~
- Sampling Trip Reports for the Cooper Road site, prepared by NUS Corporation, August and September 1987
- State, EPA, and property owner documents describing site conditions and previous cleanup activities
- Health Consultation for the Cooper Road site, prepared by the Agency for Toxic Substances and Disease Registry, August 1987
- The attached Decision Summary for the site
- The attached Responsiveness Summary for the site, which incorporates public comments received
- Staff summaries and recommendations

DESCRIPTION OF SELECTED REMEDY

The selected alternative is to take no further remedial action at the Cooper Road site. Previous cleanup activities have effectively and permanently addressed any and all public health and environmental concerns related to the site. Furthermore, it is recommended to initiate the administrative procedures to delete the Cooper Road site from the National Priorities List.

DECLARATIONS

Consistent with the Comprehensive Environmental Response, Compensation and Liability Act, as amended, and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, I have determined that the selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate for this action, and is cost effective. Furthermore, the remedy represents a permanent solution for the Cooper Road site.

The State of New Jersey has been consulted and agrees with the selected remedy, as is documented in the attached letter of concurrence.

I have also determined that this decision to take no further remedial action is appropriate when balanced against the availability of Superfund monies for use at other sites.

September 30, 1987
Date

Christopher J. Daggett
Regional Administrator

DECISION SUMMARY - SEPTEMBER 1987

COOPER ROAD DUMP

NEW JERSEY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
NEW YORK

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ATTACHMENTS
A - State Letter of Concurrence
B - Responsiveness Summary

Decision Summary

Cooper Road Dump

I. SITE LOCATION AND DESCRIPTION

The Cooper Road site is located approximately 500 feet west of Cooper Road and 500 feet south of the intersection of Treebark Terrace and Courtland Drive in Voorhees Township, situated in the north central part of Camden County, New Jersey (Figure 1). The dump encompasses a surface area of less than 100 square feet, in the vicinity of a naturally occurring sand bluff. Several dozen one to two ounce glass vials containing liquid chemicals of unknown nature were found partially buried along the top edges of an excavated soil pit area which formerly existed at the site. Some of the vials were broken; however, most were intact.

The area directly surrounding the site was formerly a pine woodlands and, at present, is being developed for residential purposes. To the east on the opposite side of Cooper Road are several private homes and industrial/office buildings. The population in the area has grown significantly within the past ten years due to substantial new construction of residential homes. Construction of a ten unit residential development is currently underway on the immediate site area, with the nearest existing home approximately 300 feet northwest of the site.

Four aquifers exist beneath the site, separated by clay layers of varying thickness (Figure 3). The upper clay layer occurs approximately 70 to 140 feet below grade, and, being somewhat permeable, allows a hydraulic connection between the first and second aquifers from the soil surface. The nearest drinking water well is on a residential property approximately 500 feet southeast of the site, screened in the second or lower aquifer. The two public water supply wells within the Township's boundaries are screened in a yet deeper aquifer over 1000 feet from the soil surface; these wells service most older homes and all of the newer residential developments.

There are several surface water discharge points in the vicinity of the site which exist approximately 80 feet below the grade of the dump area. Groundwater beneath the site thus could potentially discharge to (a) the headwaters of the north branch of the Cooper River, located 1000 feet northeast of the site; (b) to a stream 1000 feet southwest of the site which feeds into Las Bresas Lake at the end of Martindale Court in Voorhees Township, located 2200 feet southwest of the site; and (c) to a stream located 2000 feet southeast of the site which feeds Cedar Lake, 3000 feet to the east.

II. SITE HISTORY

A. Origin of Problem

In early 1982, a number of small glass vials of unknown origin and composition were discovered to have been dumped at the former sand borrow pit area identified as the Cooper Road site.

B. Initial Response Actions

In mid-1982, the New Jersey Department of Environmental Protection (NJDEP) was informed of the presence of the vials by the New Jersey State Police. NJDEP inspected the site and noted the presence of about two dozen, one to two ounce vials lying on the soil surface. Subsequent analysis of the contents of the vials indicated the presence of several hazardous substances including benzene, ethylbenzene, xylene, bis (2-chloroethoxy) methane, naphthalene and hexachlorocyclopentadiene. Believing that the vials posed a potential threat to human health or the environment, NJDEP, on October 28, 1982, issued a Directive Letter to the owner of the property to remove the hazardous materials.

Since no reply to this letter was received as of June 1983, the site was proposed by NJDEP as a candidate for Superfund cleanup under the authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). Due to its potential for significant risk to human health or the environment, primarily through the groundwater route, the Cooper Road site was thus included on the first proposed update to the National Priorities List (NPL) of Superfund sites that was published in August 1983.

Ownership of the site changed shortly after June 1983, and the new site owner became the Cinnamerican Company. While an update to the list of Superfund sites was being prepared, the Environmental Protection Agency (EPA) and NJDEP determined that the State, through its enforcement efforts, would attempt to get responsible parties to initiate cleanup activities at the site. A surface cleanup was accomplished in May 1984, pursuant to a Directive Letter issued by NJDEP to the site owner at that time. All vials were removed, as well as all soil to a depth of six inches below any container. Two 24-inch soil core samples were extracted from the excavated area. In addition, a background soil sample was obtained during a separate sampling event in May 1985 from a visually clean area away from the dumped vials.

No significant levels above background levels of any hazardous substances attributable to the vials were detected in the surface soils at the excavated area. The background sample was found to be free of any significant level of organics; some metals were detected, but at levels generally found in the soils throughout the State of New Jersey.

Specifically, lead and chromium were detected in soils (a) beneath the site immediately after the vials were removed; and (b) in the background sample, at maximum levels of 4.9 and 7.2 parts per million (ppm), respectively.

EPA was apprised of the surface cleanup and received copies of the appropriate documents from NJDEP relative to this activity. However, these documents, and the conclusion contained therein, related only to the surface soil cleanup. Subsurface conditions, including any potential groundwater contamination, were never addressed.

Thus, EPA determined in October 1984 that further characterization of subsurface site conditions was necessary to properly determine whether a release of contamination into the underlying soils and/or groundwater had occurred in the vicinity of the vials. With this additional evaluation, EPA believed it would then be able to make a proper determination on whether additional remedial measures, beyond those conducted by the owners of the property in 1984, were necessary to protect human health or the environment. The site was then placed finally on the NPL in November 1984.

C. Remedial Investigation

Due to the moderately low ranking of the site on the NPL, and because of the surface cleanup which was previously conducted, funds for additional evaluation to further characterize the potential for subsurface contamination did not become available until fiscal year 1986. During 1986, EPA and NJDEP held several discussions and reviews of existing data in order to determine the scope of additional study necessary.

In September 1986, EPA and NJDEP agreed to conduct subsurface soil and groundwater sampling that required the installation of a groundwater monitoring well at the site. EPA directed its field contractor, NUS, to perform this additional work. After EPA and NJDEP review and approval of a work plan for these activities, the well was installed and soil samples collected for laboratory analysis in early April 1987 (Figure 2). The groundwater from the well was also sampled later that month.

All data were subjected to EPA's quality-assurance/quality control process for validation. Analysis of the soil detected trace amounts of chloroform, bis (2-ethylhexyl) phthalate, lead, chromium, arsenic and nickel (Table 1-B). The maximum lead and chromium levels were not significantly different from those levels detected three years previously, at 4.7 and 6.4 ppm, respectively.

The groundwater indicated the presence of trace levels of barium, beryllium, chromium, copper, lead, vanadium, iron, zinc, and sodium, as well as other elements normally associated with background surficial aquifers in southern New Jersey.

Two metals in these groundwater samples were preliminarily indicated to be above EPA's Primary Drinking Water Regulations (40 CFR, Part 141): lead, detected at 105 parts per billion (ppb), compared to a standard of 50 ppb; and chromium, detected at 116 ppb, also with a standard of 50 ppb. However, lead and silver were also detected in a clean blank sample prepared for data validation purposes. It is believed that the blank contamination was introduced at the laboratory which conducted the analysis. The presence of this laboratory contamination, in turn, raised some question as to the validity of the reported metal values for the groundwater samples.

As a result, confirmatory groundwater sampling was conducted in mid-August 1987. This analysis detected lead and chromium at 7 and 15 ppb, respectively, significantly below the drinking water standard of 50 ppb. With this sampling event, there was no detection of any metals in the blank. An additional round of groundwater sampling, conducted in early September 1987, also found no significant levels of any contaminants in the groundwater nor in the blank. Thus, the latter two rounds of groundwater data are considered valid and representative of actual groundwater quality.

During the second round of sampling in mid-August, four homes with private wells located within a half mile of the site were also sampled. Three of the private wells are located within 1000 feet of the site at 504, 508 and 512 Cooper Road, and one domestic well located 3/4 mile from the site at 709 Cooper Road. Written records to confirm the depth of these wells could not be found. Through discussions with homeowners, two of these wells are understood to have been screened at least 140 feet below the land surface. Further discussions with a well drilling company which operates throughout Camden County indicate that this is a normal depth for the installation of private wells within the county; thus, the other two private wells are also believed to be screened at this appropriate depth.

At this depth, the private wells would be screened within the second aquifer from the soil surface (Mount Laurel), and thus be separated from any potential contamination which could exist within the upper aquifer (Cohansey/Kirkwood) by the confining semi-permeable clay unit of approximately 100 foot vertical thickness. EPA's testing of these private wells confirmed that no contaminants are present which could potentially produce any adverse health effects based on federal guidance and criteria, with no lead or chromium detected in any well.

Within a one mile radius of the Cooper Road site, the upper aquifer (Cohansey/Kirkwood) in which the monitoring well at the site is screened has not been found to be tapped for any domestic, irrigation or industrial use.

There are no known industries located within a half mile radius of the site. Those industries and homes within a one mile radius of the site that have individual wells in use are believed to also be screened in the Mount Laurel aquifer. All results of well sampling within the Mount Laurel in the vicinity of this site were consistent with State background levels and have not indicated any levels of any contaminants which could adversely affect human health.

All homes within one mile of the site in the southeast, down-gradient direction are supplied public water from the New Jersey Water Company (NJWC). NJWC owns and operates water supply wells at two locations within Voorhees Township: (1) Well #20, located near the intersection of Evesham Road and Haddonfield/Berlin Road, at 482 foot depth and one million gallon/day (MGD) pumping capacity; and (2) Well #21, located along Giggsboro Road, comprising of three actively pumping wells at 1100, 998 and 1016 foot depths and 2, 2 and 1.1 MGD, respectively.

All of these NJWC wells in Voorhees Township are screened within the Potomac-Raritan-Magothy aquifer system, which is separated from the Cohansey aquifer by the Hornerstown/Navesink, Marshalltown, Woodbury Clay and Merchantville confining zones. Also, the NJWC wells are double-cased through the Woodbury Clay formation in order to minimize the potential of cross-flow from the upper aquifers to the Potomac-Raritan-Magothy aquifer.

The NJWC water supplied to Voorhees Township is regularly tested by NJWC biannually for the presence of contaminants, more often than is required annually by NJDEP's "A-280" public water supply testing program. These sampling results have not indicated any detectable levels of any tested contaminants.

III. Risk Assessment

This section is a general public health evaluation which follows the guidelines established by EPA for risk assessments under CERCLA. The risk assessment provides a quantitative estimate of risk levels under existing conditions, in the absence of further remedial action. This is used to determine whether any additional remedial action at the site is warranted. The risk assessment was developed as follows: identify contaminants of potential concern; describe potential pathways of exposure associated with site contaminants; estimate levels of exposure and determine populations affected; and characterize current and potential risks to human health and the environment.

Selection of Potential Contaminants of Concern

According to the Superfund Public Health Evaluation Manual (EPA 1986), contaminants of concern are selected to focus the public health evaluation on the contaminants most likely to pose health risks. The following assessment of present site conditions is provided to confirm that no potentially adverse health risks exist at the site.

Through concurrence with NJDEP, EPA's Maximum Contaminant Levels (MCLs), promulgated under the Safe Drinking Water Act, and NJDEP's Interim Action Levels for Selected Organics in Drinking Water have been established as the applicable or relevant and appropriate requirements (ARARs) for the groundwater in the vicinity of the site.

No organics of any significant concentration, according to EPA and NJDEP ARARs, were detected in the soils, groundwater or potable water supplies in the vicinity of the site during the field investigation.

Analysis of the initial round of groundwater samples collected at the site in April 1987 tentatively indicated that two metals, lead and chromium, were above EPA's and NJDEP's drinking water ARARs. This initial detection of lead and chromium was considered questionable due to the detection of metals in the laboratory blank. As noted previously, confirmatory groundwater sampling conducted in mid-August 1987 indicated lead and chromium, at 7 and 15 ppb, respectively, with no blank contamination (Table 1-A).

The EPA has not established action levels for chemicals of concern in soils. The NJDEP has developed action levels for certain metals in soils based on background or multiples of background metal concentrations. These numbers are used in State cleanup programs, both publicly and privately funded, such as the Environmental Cleanup Responsibility Act.

Of the metals found at the Cooper Road site, State soil action levels have been established for two: chromium at 100 ppm, and lead at 100 ppm. Concentrations of chromium and lead at the Cooper Road site are well below these State action levels, at a maximum of 6.4 and 4.7 ppm, respectively. All of the trace levels of metals found in the on-site soils were at levels typically found in background soils throughout the State of New Jersey (Table 1-B).

Therefore, since no contamination in the underlying soils and groundwater at the site has been detected above any applicable or relevant and appropriate standard which would indicate a potential health threat, there are no contaminants of concern at this site.

Exposure Pathways

Since no residual contaminants from the vials were found to be present in the soils or groundwater after the vials were removed, potential exposure to residual contamination from the site through the groundwater, surface water, soils and air appears to be non-existent. Sampling results from the remedial investigation confirm this determination.

The low, background levels of lead and chromium in soils at the site do not have any direct contact health risk potential because the levels detected were several orders of magnitude lower than any levels which could potentially produce any adverse health effects, according to EPA's Public Health Evaluation Guidance, assuming either (a) inadvertent, and unlikely, ingestion of 100 milligrams/soil/day for 50 days/year for 30 years; or (b) normal daily dermal contacts. In addition, the owners of the site have previously removed approximately forty vertical feet of the original soils at the site during May 1986, over which an estimated twenty feet of new fill has been placed.

For the sake of caution, a conservative approach was adopted utilizing a model to simulate the maximum impact associated with a potential release of the trace levels of chromium and lead detected in the soil into the groundwaters or surface waters in the vicinity of the site. It was found that potential releases of lead and chromium from site soils would dissipate to concentrations below drinking water standards less than 1000 feet from the site's monitoring well. Since there are no receptors utilizing the surface aquifer for drinking purposes within 1000 feet of this well, it was concluded that no potential adverse effects to human health or the environment exist nor would occur in the future as a result of the release of trace metals from the background soils into the groundwater.

Risk Characterization

A risk characterization assessment based on all available data generated during the remedial investigation was conducted. This assessment concluded that, because no contaminants of potential concern exist in the groundwater or soils at this site, no cancer risk exceeding 10^{-6} for groundwater ingestion or soils exposure exists. This indicates that one would not expect even one incidence of cancer in a hypothetical population of 1,000,000 people who could possibly ingest the groundwater or be exposed to soils at the site.

This conclusion was confirmed by the Agency for Toxic Substances and Disease Registry (ATSDR), under the Centers for Disease Control. ATSDR's August 28, 1987 Health Consultation concluded that the groundwater does not pose a threat to public health.

Environmental Impacts

Because there were no residual contaminants left in the soils or groundwater, there are no resultant environmental impacts expected from the Cooper Road site. This determination of no significant environmental impact is confirmed through comparison of Ambient Water Quality Criteria with concentrations of contaminants detected in the groundwater at the site (Table 1-A).

The surface waters in the area which could have potentially been affected by possible releases of contaminants from the soils and/or groundwater at the site include the headwaters of the north branch of the Cooper River located 1000 feet northeast of the site, a stream 1000 feet southwest, and a stream located 2000 feet southeast of the site which feeds Cedar lake. Low level, ubiquitous lead and chromium concentrations in the upper aquifer and soils were revealed during the remedial investigation. The model which determined the worst-case potential for release of lead and chromium from the background soils into the groundwater at the site confirmed that no potential adverse environmental impact exists.

IV. ENFORCEMENT ACTIVITIES

As discussed previously, the owners of the site property in 1984 performed the surface cleanup of the vials and surrounding soils to NJDEP and EPA satisfaction. Since the generator(s) of the vials have not been found, and because their placement at the site appears to have been done without the knowledge of the property owner, no additional enforcement actions are anticipated.

V. COMMUNITY RELATIONS

Community involvement was solicited at the conclusion of the remedial investigation at the Cooper Road site. The Preferred Remedial Action Plan with supporting attachments, which identified EPA's and NJDEP's preferred remedial alternative of no further action for this site, was released to the public information repositories on August 28, 1987. The public comment period, initiated on this date, solicited public comment through September 25, 1987. A public meeting was held on September 10, 1987 to present EPA's preferred remedial alternative and provide an opportunity for public participation. Town officials and citizens who live in the vicinity of the site attended.

Specific concerns raised during the public comment period, including comments made at the public meeting, are addressed in the attached Responsiveness Summary. It should be noted that most of the public comments involved the nearby Buzby Landfill. A transcript of the public meeting is available in the Administrative Record located at the information repositories and at the regional office.

VI. ALTERNATIVES EVALUATION

The remedial alternative for the Cooper Road site was developed and evaluated using the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300.

The Superfund legislation requires that each remedy selected for a site must be protective of human health and the environment, cost effective, and in accordance with statutory requirements. Permanent solutions to toxic waste contamination problems are to be achieved wherever possible. Under the NCP, specifically 40 CFR Part 300.68(j), the cost-effective remedy is the lowest cost alternative that is technically feasible and reliable and which effectively mitigates and minimizes damages to and provides adequate protection of public health, welfare, and the environment.

The results of field investigations reveal that no levels of contaminants attributable to the contaminants known to have existed prior to the removal at Cooper Road remain in the environment at the site. Because EPA's and NJDEP's evaluation of the cleanup performed at the Cooper Road site indicates that there is no longer a source of contamination nor is there any migration of contaminants in the air, groundwater, surface water or soil, additional potentially feasible remedial actions such as capping, further soils removal and/or groundwater treatment are not necessary to protect human health or the environment.

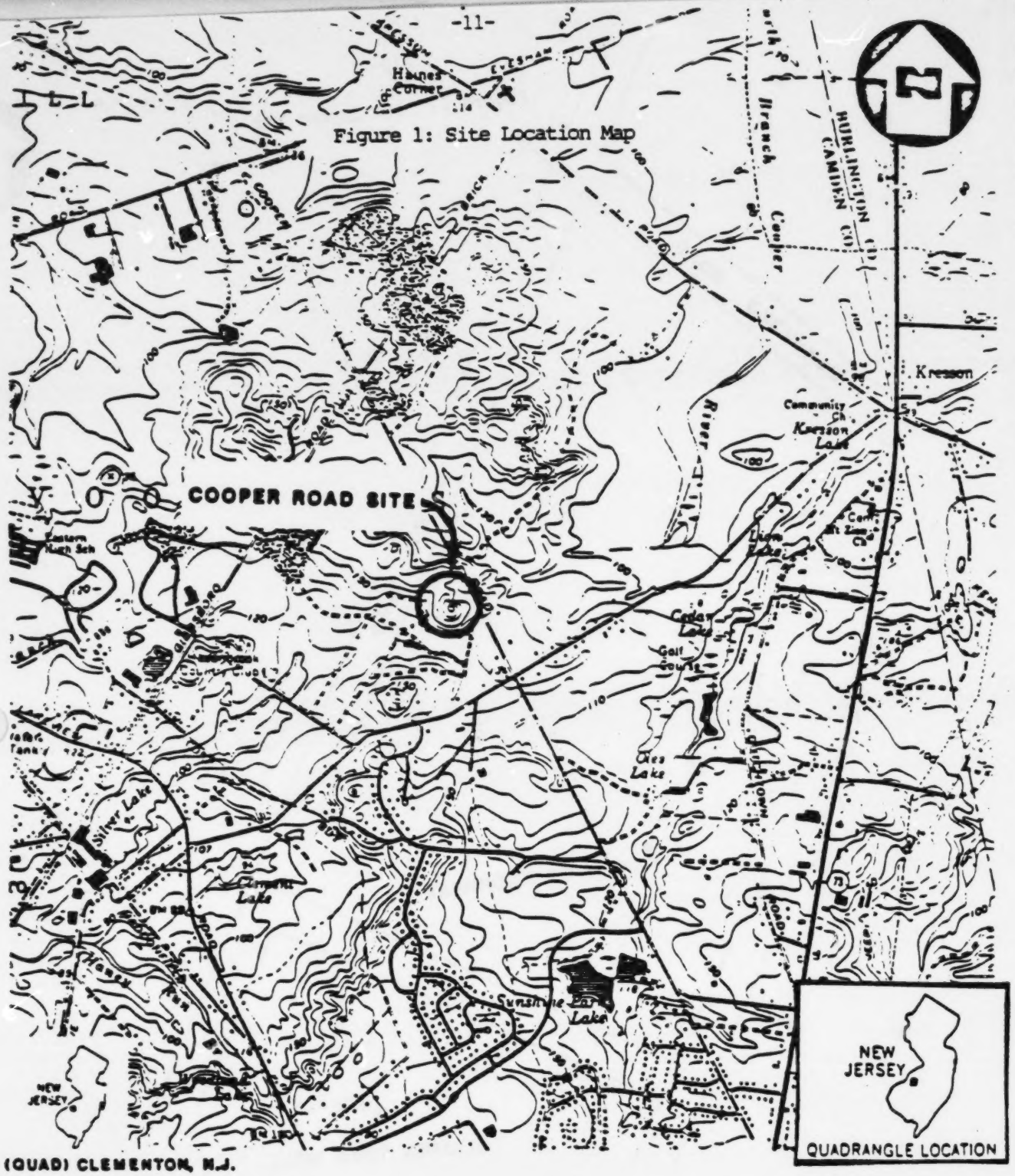
In addition, since there is no further potential for risk at the site due to the lack of any residual contamination in the surface soils or the groundwater at the site, no continued monitoring of the shallow underlying aquifer is necessary to address the possibility of unexpected off-site migration of hazardous substances.

VII. SELECTED REMEDY

As noted previously, cleanup activities conducted at the site have effectively and permanently addressed any and all public health or environmental concerns related to the Cooper Road site. The selected remedy for the Cooper Road site therefore calls for no additional remedial actions to be taken, and was arrived at by evaluating all site data which were available after completion of the remedial investigation. The remedy was selected in accordance with the statutory requirements established in CERCLA and, to the extent practicable, the NCP.

The selected remedy complies with all legally applicable or relevant and appropriate requirements in a cost effective manner, and requires no treatment technologies or special engineering considerations. The remedy requires no operation and maintenance, no temporary storage requirements nor safety requirements for implementation. The selected remedy is protective of human health and the environment.

Figure 1: Site Location Map



(QUAD) CLEMENTON, N.J.

FIGURE 1

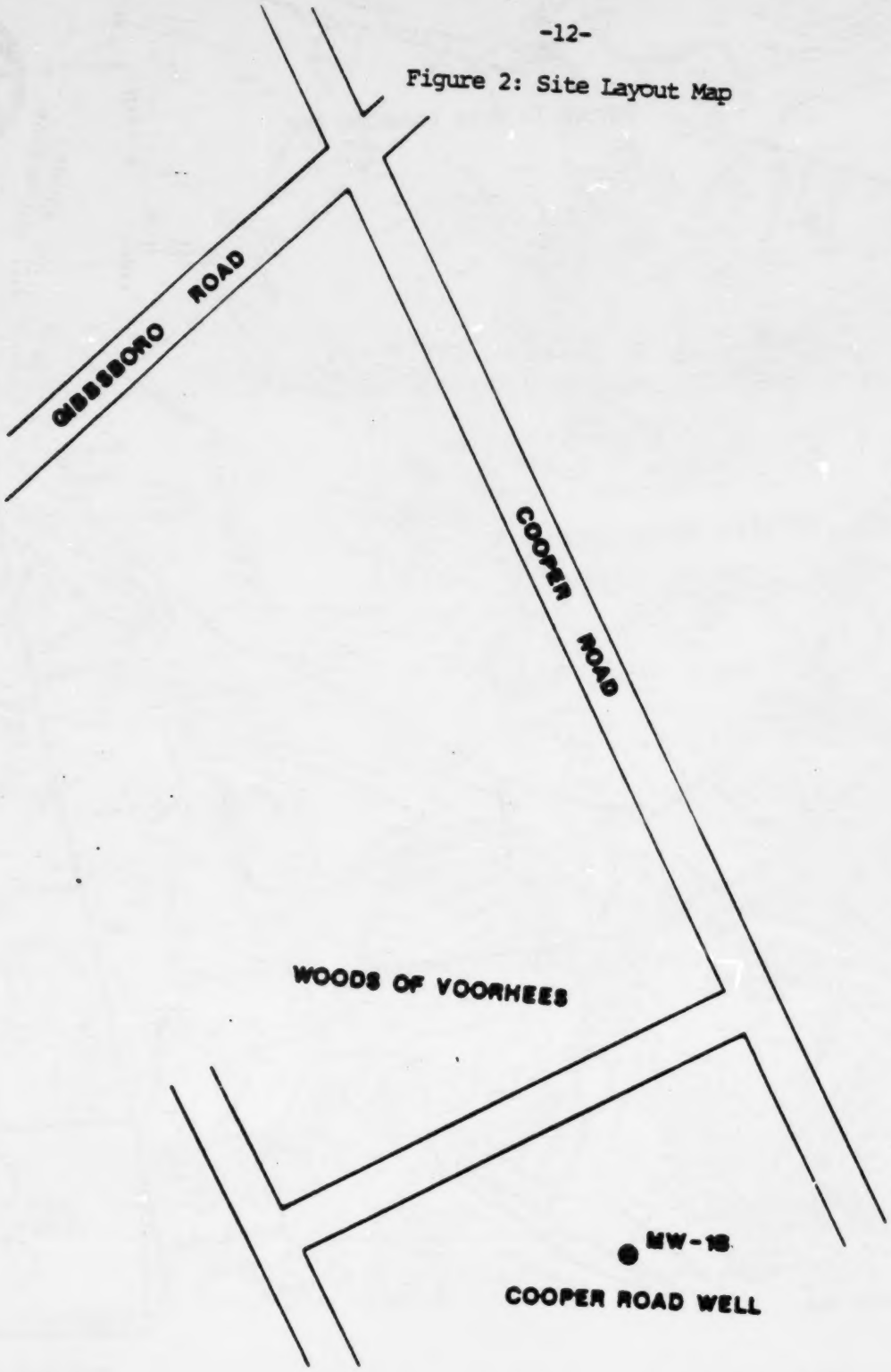
SITE LOCATION MAP

COOPER ROAD SITE, VOORHEES TWP., N.J.

SCALE: 1" = 2000'

NUS CORPORATION
A Halliburton Company

Figure 2: Site Layout Map

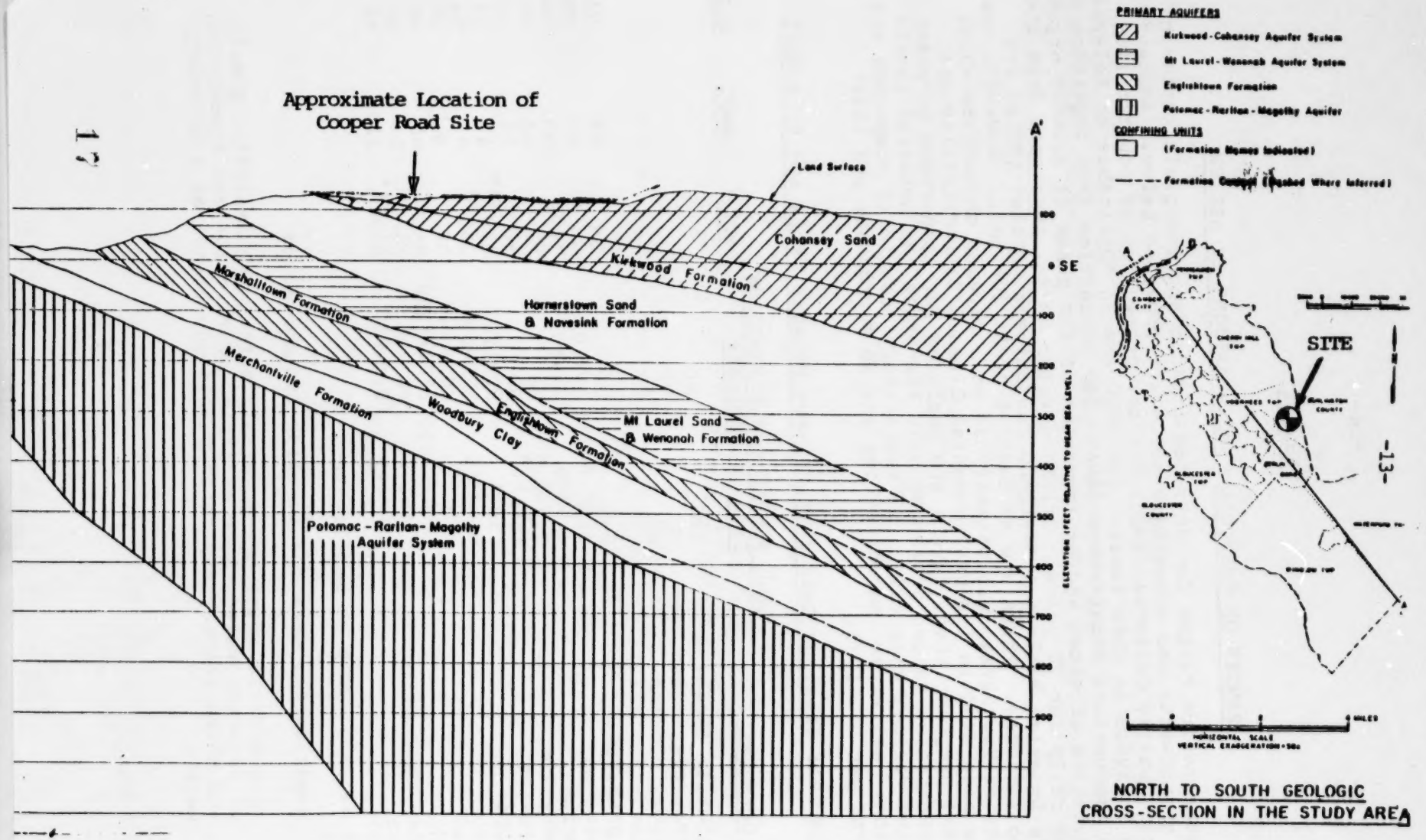


SITE MAP
COOPER ROAD SITE, VOORHEES TWP., N.J.
(NOT TO SCALE)

FIGURE 2

NUS CORPORATION

Figure 3: Geologic Cro[illegible] Section Map



NORTH TO SOUTH GEOLOGIC CROSS-SECTION IN THE STUDY AREA

TABLE 1

RANGES OF CHEMICAL CONCENTRATIONS BY MEDIUM

Concentration ranges for detected organic and inorganic contaminants in groundwater and subsurface soils are provided below. Ambient Water Quality Criteria (AWQC) for the protection of aquatic life are included in this table. The AWQC are an Applicable or Relevant and Appropriate Requirement (ARAR) for protection from ingestion of two liters of water and/or ingestion of 6.4 grams of aquatic organisms daily for 70 years. Drinking water ARARs, developed from the Safe Drinking Water Act "Maximum Contaminant Levels" (MCLs) are also included. There are no federal ARARs for soil. However, the State of New Jersey has established soil cleanup objectives which have been used in its Environmental Cleanup Responsibility Act (ECRA) program; these levels are included for comparison purposes. Concentration ranges presented only represent the detected levels of the various chemicals. No tentatively identified compounds are listed. All water concentrations are in micrograms per liter (parts per billion).

Table 1-A: Sampling Data from Private Potable Wells and Site Well

CHEMICAL	WELL SAMPLE CONCENTRATIONS Site	Private	MCL	AWQC	ECRA
volatile organics	ND	ND			
PCBs, pesticides	ND	ND			
acids, dioxins	ND	ND			
bis(2-ethylhexyl) phthalate	2.4	ND	NA	NA	NA
aluminum	5190-81000	37-102	NA	NA	NA
barium	44-150	12-59	1000	NA	NA
berrylium	2.3-2.5	ND	NA	NA	NA
chromium	15-116*	ND	50	16	NA
copper	15-75	ND-11	1000**	18	NA
iron	68-8860	322-686	300**	NA	NA
lead	7-105*	ND	50	8.2	NA
sodium	1360-10200	1150-1800	NA	NA	NA
vanadium	7.4-170	ND	NA	NA	NA
zinc	8.4-149	8.8-11	5000**	320	NA

NA = not available or applicable

* = questionable data due to blank contamination

** = contaminants which may adversely affect the aesthetic quality of drinking water, such as taste, odor, color and appearance, and which thereby may deter public acceptance as a drinking water.

Table 1-B: Sampling Data from Soils

Chemical	Sample Concentration*			State Cleanup Objective*	Average Soil Concentration in New Jersey *
	1984	1985	1987		
Pesticides	ND	ND	ND	NA	not available
PCB's	ND	ND	ND	NA	not available
acids	ND	ND	ND	NA	not available
dioxins	ND	ND	ND	NA	not available
bis (2-ethylhexyl) phthalate			.039	NA	not available
chloroform	ND	ND	7.6	NA	not available
arsenic	NA	ND	.0023	20	5
barium	NA	5.9	ND	400	not available
berrylium	NA	ND	ND	1	not available
cadmium	NA	8.7	ND	3	1-4
chromium (total)	NA	7.2	6.4	100	5-48
copper	NA	5.2	ND	170	0.5-53.6
lead	NA	4.9	4.7	250-1000**	1-180
mercury	NA	ND	ND	1	0.147
nickel	NA	2.9	5.8	100	11.1-86.5
selenium	NA	ND	ND	4	0.01-4
silver	NA	ND	ND	5	not available
zinc	NA	9.6	18	350	4.5-168

* = parts per million
** = depends on location within State
ND = no detection
NA = not applicable

COOPER ROAD DUMP SITE
VOORHEES TOWNSHIP, NEW JERSEY

RESPONSIVENESS SUMMARY

The U.S. Environmental Protection Agency (EPA) conducted a public comment period from August 29, 1987 through September 25, 1987 for interested parties to comment on EPA's preferred approach for addressing the Cooper Road Dump site. EPA also held a public meeting on September 10, 1987 at the Voorhees Township Hall to describe the preferred approach.

This responsiveness summary is required by Superfund policy for the purpose of providing EPA and the public with a summary of citizen comments and concerns about the site, as raised during the public comment period, and EPA's responses to those concerns. All of the comments summarized in this document will be factored into EPA's final decision for addressing the Cooper Road Dump site.

This responsiveness summary for the Cooper Road Dump site is divided into the following sections:

I. Overview. This section provides a brief description of the Cooper Road Dump site and the cleanup actions taken to date.

II. Background on Community Involvement and Concerns. This section provides a brief history of community interest in the Cooper Road Dump site since its discovery in 1982.

III. Summary of the Major Questions and Comments Received During the Public Comment Period and EPA Responses to Comments. This section summarizes major questions and comments made verbally to EPA during the public meeting and the public comment period, and provides EPA responses to comments.

IV. Remaining Concerns. This section summarizes community concerns that EPA should be aware of as they prepare to undertake the process of removing the Cooper Road Dump site from the National Priorities List (NPL).

I. OVERVIEW

The Cooper Road Dump Site is located in Voorhees Township, New Jersey in the north central part of Camden County. The site is approximately one-quarter mile from Cooper Road and is at the top of a 40-foot high sand bluff. Numerous vials containing benzene, bis(2-chloroethoxy) methane, and hexachlorocyclopentadiene were discovered partially buried near the bluff in 1982. The site was proposed by the state to be placed on the National Priorities List (NPL), a roster of the national hazardous waste sites, in August 1983, and was formally added to the NPL in November 1984.

In May 1984, at the request of the New Jersey Department of Environmental Protection (NJDEP), the site owner removed the vials and visibly contaminated soil to a depth of six inches below any containers. These wastes were placed in two fifty-five gallon drums and transported to an approved hazardous waste landfill in Pennsylvania. Upon completion of this removal action, soil samples were analyzed and shown to be clean. Additional soil sampling in 1985 revealed no contamination. Subsequently, the owner removed and backfilled the area with approximately thirty feet of topsoil. Early in 1987 a groundwater well was installed and sampled. Sampling of the well at that time revealed elevated concentrations of lead. Because one of the samples identified as containing lead was a "blank" sample (a sample known to be uncontaminated and used to ensure the accuracy of the test results), the test results for that sampling round were rejected (i.e., not accepted as accurate). In 1987, EPA conducted both soil and groundwater sampling that showed no residual contamination.

At the September 10, 1987 public meeting, EPA presented its preferred approach for addressing the site. EPA's sampling of the soil and groundwater at the site has now been completed and the results have confirmed that there is no residual contamination from the vials at the site. EPA and NJDEP agree that previous cleanup at the Cooper Road Dump site has effectively and permanently addressed public health and environmental concerns. Consequently, EPA and NJDEP are recommending that no further remedial actions be taken at the site, and EPA would like to initiate procedures to delete the Cooper Road Dump site from the NPL.

II. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS

Local officials and residents have expressed concerns to NJDEP and EPA and have contacted their state and local representatives have since the discovery of the Cooper Road Dump Site in 1982. Community concern focused on the following:

- Potential health impacts of community exposure to the contaminants at the site. Residents have expressed concern that contaminants released from the broken vials found at the site may have migrated into the groundwater and exposed nearby residents to a health threat through ingestion of contaminated groundwater.

- Potential adverse effects on housing values resulting from the perceived stigma of having a Superfund site within the community. Residents have expressed concern that housing values could potentially decrease and that resale of houses might be more difficult if the area is perceived to be contaminated with hazardous waste.

- Removal of the site from the National Priorities List (NPL). Several residents and local officials expressed concern that since the site does not pose a threat to public health and safety, it should be removed from the NPL.

A public comment period was held from August 29, 1987 to September 25, 1987 to receive comments from the public regarding EPA's preferred approach for addressing the Cooper Road Dump site. The public meeting was held on September 10, 1987 at 7:00 p.m. in the Voorhees Township Hall, Voorhees, New Jersey. The meeting was attended by EPA officials, members of EPA's contractor staff, local officials and interested residents.

III. SUMMARY OF QUESTIONS AND COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD AND EPA's RESPONSE TO COMMENTS

Approximately 35 interested area residents attended EPA's September 10, 1987 public meeting. Comments and EPA responses made during the September 10 public meeting are summarized below and organized into the following categories:

A. Remedial activities;

B. Identification and roles of potentially responsible parties (PRPs); and

C. Other concerns.

Several comments were received regarding Buzby Landfill, a landfill in Voorhees Township. These comments are summarized under Category C: Other concerns.

A. REMEDIAL ACTIVITIES

1. COMMENT: Several residents expressed concern that EPA's recent sampling at the dump site would not reveal contamination because the site owner excavated more soil in 1986. Residents claimed that the soils removed from the site in 1986 were contaminated and had been improperly disposed of in a wetland area in the town.

EPA RESPONSE: EPA explained that the vials along with all soil to a depth of six inches below any container were removed to an approved hazardous waste landfill in Pennsylvania. After the removal, soil sampling was conducted prior to any activities that would have disturbed the soil. Subsequent soil and groundwater sampling shows no evidence of residual contaminants at the site. Current development on the site does not pose any risk to public health or the environment.

2. COMMENT: Several residents inquired about details of remedial activities. They wanted to know who was responsible for requiring and supervising the cleanup and how much the site investigation and cleanup had cost to date.

EPA RESPONSE: EPA stated that the cleanup was performed by the owner of the property at the request and under the supervision of the NJDEP. EPA added that the total cost of the site investigation has not yet been determined, but it is estimated to be in the tens of thousands of dollars.

3. COMMENT: Several residents questioned the validity of EPA laboratory sample results that were used to determine whether contamination existed at the site. They referred to an incident when EPA sent a "blank" water sample without contaminants to a private testing lab in 1987 and the results reported it to be contaminated.

EPA RESPONSE: EPA responded that all samples taken at hazardous waste sites under EPA's Superfund program are tested at an EPA certified laboratory and conducted under a rigorous protocol to ensure that the results are accurate. EPA added that it is not unusual for minor problems to occur during the testing process. In this case, the sample was rejected. EPA regularly inserts "blanks" containing no contaminants and "spikes" containing contaminants, not related to the site, to ensure proper testing at all labs. EPA stated that results of all tests will be sent to township officials for their information.

B. IDENTIFICATION AND ROLES OF POTENTIALLY RESPONSIBLE PARTIES (PRPs)

1. COMMENT: Many residents questioned the sequence of ownership of the site.

EPA RESPONSE: EPA stated that some confusion exists as to who now owns the site. The current status and sequence of ownership can be confirmed through local tax records.

2. COMMENT: A resident asked who would be responsible for the cost of cleanup if the responsible party cannot be identified.

EPA RESPONSE: EPA explained that financial responsibility for the cleanup of a site in which the potentially responsible party (PRP) remains unknown is covered by a trust fund of federal monies. If, and when, a PRP is identified, EPA may seek to compel the PRP(s) through litigation or administrative order to pay the cleanup costs.

C. OTHER CONCERNS

1. COMMENT: Two residents and a local official believed that there was not enough advance notice of the meeting.

EPA RESPONSE: EPA stated that a news release was issued to a major area newspaper, The Camden Courier Post. The meeting also was announced at a previous town meeting, at which the news media were present.

2. COMMENT: A resident asked how often NJDEP tested drinking water to ensure cleanliness.

EPA RESPONSE: EPA explained that public water supplies generally are tested quarterly and the results are sent to the state which keeps them on public record.

3. COMMENT: A resident expressed concern that the Buzby Landfill (a landfill in Voorhees Township) was not placed on the NPL when it was evaluated in 1983.

EPA RESPONSE: EPA explained that when the Buzby Landfill was originally investigated in 1983, it did not score high enough on the hazardous waste ranking system to be included on the NPL. EPA can reevaluate the site for NPL status if current data show the site to rank high enough and if the state requests the site to be nominated for the NPL. It is the state's prerogative to provide EPA with candidate sites to put on the NPL. EPA added that due to the great interest expressed at the September 10 meeting, EPA will discuss the issue with the state. A record of the public comments at the meeting will also be sent to the state to make them aware of the level of concern. In addition, residents were told that they can write their elected state and Congressional representatives about their concerns.

4. COMMENT: A resident and a local official both asked whether placing Buzby Landfill on the NPL would ensure quicker remediation of the site.

EPA RESPONSE: EPA responded that the state can be effective in dealing with many hazardous waste sites without placing the sites on the NPL. In other cases it is apparent that placing a site on the NPL expedites the remedial process.

IV. REMAINING CONCERNS

Residents stated that they are relieved that the Cooper Road Dump site will be removed from the NPL. The residents, however, do have some remaining concerns that EPA should be aware of as it prepares to remove the Cooper Road Dump site from the NPL. These concerns include:

- The belief that property values have declined as a result of having a Superfund site in the township. Former residents from the vicinity of the Cooper Road Dump site claimed to have received less than the market value for their homes when they moved. The possibility of Buzby Landfill becoming a Superfund site has reinforced the residents' concern about property values in the area.

- Some residents are still concerned about soil that was removed from the site and used as fill in a township wetland area. This soil was taken from the property that includes the Cooper Road site after the vials and contaminated soil at the site were disposed of, but residents were not sure if the situation had been fully addressed.

  In reference to this concern, EPA has stated that EPA and NJDEP sampling has consistently shown no residual contamination at the site and consequently the situation has been addressed.

- Residents would like the data on the groundwater and soil sampling results. In addition, they requested that all updated material on the site to be forwarded to the township, so that it would be available to all interested parties.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
RICHARD T. DEWLING, Ph.D., P.E., COMMISSIONER
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28 SEP 1987

Mr. Christopher J. Daggett
Regional Administrator
USEPA - Region II
26 Federal Plaza
New York, N.Y. 10278

Dear Mr. Daggett:

This is to formally notify the United States Environmental Protection Agency that the New Jersey Department of Environmental Protection has reviewed the draft Record of Decision for the Cooper Road Site and concurs with the recommended remedy.

In this case, no further remedial actions are considered appropriate. The cleanup already conducted at the site has effectively and permanently addressed any contamination problems which previously existed.

New Jersey fully appreciates the importance of the Record of Decision in the cleanup process and will continue to take all reasonable steps to ensure that the State's commitments in this area are met.

Sincerely,

Richard T. Dewling